

From: [Moore, Gary](#)
To: [Warren, Christy](#)
Subject: Re: Sample Status
Date: Wednesday, November 19, 2014 7:46:25 AM

I can but need to start getting them to get in proper waste stream. Does anyone else put them together today.

Sent from my iPhone

On Nov 19, 2014, at 7:43 AM, "Warren, Christy" <warren.christy@epa.gov> wrote:

Gary,

I would need more time to locate all of the containers and prep them for transfer and eventual disposal. I am working from home today also.

Does this mean you will take them back to the site?

Christy Warren

U.S. EPA Region 6 Laboratory
Sample Control Coordinator
10625 Fallstone Road
Houston, Texas 77099
281-983-2137 (office)
281-983-2124 (fax)
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From: Moore, Gary
Sent: Tuesday, November 18, 2014 6:25 PM
To: Warren, Christy
Subject: Re: Sample Status
Can I come by in the morning and get them?

Gary Moore

Federal On-Scene Coordinator
U.S. EPA Region 6
214-789-1627 cell
214-665-6609 office
moore.gary@epa.gov

From: Warren, Christy
Sent: Tuesday, November 18, 2014 4:35 PM
To: Moore, Gary
Subject: RE: Sample Status

Towards the back of the report I sent you is a copy of the COC. The COC lists where the sample was collected and it also lists the number and type of container. You probably need to double the number of containers as we also have company splits.

If you need anything else to decide – just let me know.

Christy Warren

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From: Moore, Gary

Sent: Tuesday, November 18, 2014 4:22 PM

To: Warren, Christy

Subject: Re: Sample Status

How much do you have and are the tanks where they came listed?

Gary Moore

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From: Warren, Christy

Sent: Tuesday, November 18, 2014 3:42 PM

To: Moore, Gary

Subject: RE: Sample Status

Gary,

Attached is the original report and an amended report for the CES criminal work we did.

John Fowler at NEIC can probably get you any data from their lab or point you to the right person.

I have a question for you....the laboratory still has all of the remaining sample volume from the CES criminal work. We have gotten the ok to dispose letter from CID just haven't gotten rid of the material yet. Any chance we could coordinate a return to the site (like we did for the PCB samples from Old Esco) for disposal?

Christy Warren

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From: Moore, Gary
Sent: Tuesday, November 18, 2014 3:18 PM
To: Warren, Christy; Gregg, Diane
Subject: Re: Sample Status

Christy:

That would be wonderful. Do you know the NEIC folks that did analysis on some of the samples?

Gary Moore

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From: Warren, Christy
Sent: Tuesday, November 18, 2014 1:53 PM
To: Gregg, Diane; Moore, Gary
Subject: RE: Sample Status

Gary,

I can send you a pdf of the criminal assessment done by Guy/Gary – I just need to look up the project number and find the file on our servers.

Christy Warren

U.S. EPA Region 6 Laboratory

Sample Control Coordinator

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From: Gregg, Diane
Sent: Tuesday, November 18, 2014 1:51 PM
To: Moore, Gary
Cc: Warren, Christy
Subject: RE: Sample Status

We re-extracted FT506 today for Heptachlor and Hept Epoxide. That's going to take a few days to cleanup and analyze. When do you really need the report by? If you could give me a date to shoot for, I can see what we can do. We have quite a few large reports in the queue ahead of CES.

Thanks

From: Moore, Gary
Sent: Tuesday, November 18, 2014 12:16 PM
To: Gregg, Diane
Cc: Warren, Christy

Subject: Re: Sample Status

Diane:

Just checking in and not trying to be pushy. For planning purposes, I wanted to find out the timing you think on completing everything and getting it documented in a report that we can use for disposal procurement.

Also, I wanted to know if you guys have any of the analytical for the criminal assessment that was done by Guy Tidmore/Gary Porter. I wanted to use some of that data for being able to use Generator Knowledge on some of the disposal. Guy also indicated that NEIC may have some of the analytical data.

Thanks for your help

Gary Moore

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From: Gregg, Diane

Sent: Monday, November 17, 2014 12:01 PM

To: Moore, Gary

Subject: RE: Sample Status

We'll go ahead and re-extract with QC that has Hept and HE in it. We will probably spike another MS below the regulatory limit in case we have to use something like GC-QQQ to deconfirm.

From: Moore, Gary

Sent: Monday, November 17, 2014 11:32 AM

To: Gregg, Diane

Subject: Re: Sample Status

Diane

Sorry, I am on the road down to Houston. I don't know enough to tell you one way or the other. What do you think is the best based upon what we are trying to achieve.

Thanks

Gary

Sent from my iPhone

On Nov 17, 2014, at 8:42 AM, "Gregg, Diane" <Gregg.Diane@epa.gov> wrote:

We can try. We may have high reporting limits also because of the oil interferences. Are you okay with us reporting the extraction we did for chlordane last week (QC would only contain chlordane)? Or do you want us to go back and extract using pesticide QC that would contain Hept and HE? thanks

From: Moore, Gary

Sent: Monday, November 17, 2014 8:32 AM

To: Gregg, Diane

Subject: Re: Sample Status

Diane:

For my peace of mind could you go ahead and run Heptachlor

and Heptachlor Epoxide on FT506 if it won't be a big issue.

Thanks

Gary Moore

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U.S. EPA Region 6

214-789-1627 cell

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moore.gary@epa.gov

From: Gregg, Diane

Sent: Monday, November 17, 2014 8:18 AM

To: Moore, Gary

Cc: Warren, Christy

Subject: RE: Sample Status

Guy is correct that you can't add non-detects together. However, your contractor is also correct if the analytes were really present at just below the levels indicated, then cumulatively they could be more than the MCL ($0.0042 + 0.0057 \text{ mg/L} = 0.0092 \text{ mg/L}$; which is $>0.008 \text{ mg/L}$). I highly doubt that these analytes are present though. Even in real world samples where pesticides are known to be present, we rarely ever detect heptachlor epoxide. Heptachlor is seen but not the epoxide. I would say it's a pretty safe bet that these are not present $>0.008 \text{ mg/L}$ cumulatively. We can try to check for you if you want us to. Let us know.

We're running the FT1004 for DNTs now. We'll let you know if the GC/QQQ works to confirm the absence of this analyte. If not we'll try our GC/NPD.

From: Moore, Gary

Sent: Monday, November 17, 2014 7:59 AM

To: Gregg, Diane

Cc: Warren, Christy

Subject: Re: Sample Status

Container Questioned TCLP Codes Deleted (Houston Lab)

FT1004 D030, D032 D032

FT506 D020, D031(?) D020

Diane:

Based upon what you previously told me, we have cleared up D032 for FT1004 and D020 for FT506. I believe that all I need to clear up now is DNT for FT1004 and maybe D031 from FT506. My contractor had an issue with the D031 for FT506 but the TCLP results were:

Analyte TCLP Result (mg/l) SDL (mg/l)

Heptachlor 0.0042 U 0.0042

Heptachlor Epoxide 0.0057 U 0.0057

Her concern was that when you add the detection undetect results together they would exceed the regulatory level for Heptachlor (and its epoxide) of 0.008 mg/l . I talked with Guy Tidmore and he indicated that you can't really add non-detect levels together. For me, out of an abundance of caution, I was going to go ahead and have us make this determination so there is no question. What do you think? Does this make sense or do we not need to worry because its not an

issue?

We definitely need to determine DNT for FT1004. Maybe Heptachlor and Heptachlor Epoxide for FT506.

Call me on my cell.

Thanks

Gary Moore

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From: Gregg, Diane

Sent: Monday, November 17, 2014 6:47 AM

To: Moore, Gary; Warren, Christy

Subject: RE: Sample Status

We were analyzing both samples for all three analytes (DNT, HCB and Chlordane). Is this correct that you do not need Chlordane on FT1004?

This is the sample we were going to reanalyze today after additional cleanup? Also, we did not analyze for Heptachlor and the epoxide. We could look into analyzing the extract for those on FT506 but we would not have the normal QC (we used chlordane in the BS, MS/MSD).

Please let us know if we can cancel Chlordane on FT1004 and if you would like us to add Hept and Hept Epox to FT506.

Thanks

From: Moore, Gary

Sent: Sunday, November 16, 2014 4:34 PM

To: Gregg, Diane; Warren, Christy

Subject: Re: Sample Status

Diane:

Thanks for all your help. We may need some additional help on some others later so if you guys have figure out a good system for oily samples that would be great. I will try to limit the number of samples to send you unless the disposal will be very costly.

Container Questioned TCLP Codes Deleted (Houston Lab)

FT1004 D030, D032 D032

FT506 D020, D031(?) D020

On FT506, can you tell anything about heptachlor and heptachlor epoxide. Each showed non-detect at the regulatory level but these are apparently additive for RCRA Waste determinations. I think it would be non-haz but wanted to see if you guys have a call based upon Heptachlor (and its epoxide). I was planning on making the call as non-haz since each was non-detect individually at the regulatory level.

On FT1004, The only code if have left for final determination is D030 (DNT).

Thanks again for all your help.

Gary Moore

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From: Gregg, Diane
Sent: Friday, November 14, 2014 2:37 PM
To: Moore, Gary; Warren, Christy
Subject: RE: Sample Status

Hi Gary,

I was working on an email when I got your response.

We can definitively prove there is no hexachlorobenzene in either sample.

We can prove there is no chlordane in Sx 1411006-02 (FT506). We are going to do an additional cleanup on sample 1411006-01 (FT1004) for chlordane to try to remove phenolic interferences which are too high (would result in a reporting limit about 10X too high). As for DNT (per our previous emails), the presence/absence is masked by the oil on a GC-MS (single quad). We will have to rerun the extracts using our GC-QQQ next week. If GC-QQQ doesn't provide us an answer, we can try our nitrogen phosphorous detector or some additional cleanups.

So we can knock out some codes for you and I still have hope to knock out more. Will let you know next week as soon as we know something.

Have a great weekend.

From: Moore, Gary
Sent: Friday, November 14, 2014 1:04 PM
To: Warren, Christy; Gregg, Diane
Subject: CES: Sample Status

Christy/Diane:

Can you give me a status of the samples that I sent to you guys?

Thanks for your help.

Gary Moore

Federal On-Scene Coordinator

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